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SUBJECT: Responds to NRC 910913 ltr re violations noted in Insp Rept  
 50-397/91-24. Corrective actions: training matrix developed to  
 include specific training on various info sys & sys  
 walkdown checklist written to document insps.

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October 14, 1991  
G02-91-187

Docket No. 50-397

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Mail Station P1-137  
Washington, D. C. 20555

Gentlemen:

Subject: NUCLEAR PLANT NO. 2, OPERATING LICENSE NO. NPF-21  
NRC INSPECTION REPORT 91-24  
RESPONSE TO NOTICE OF VIOLATION

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated September 13, 1991. Our reply, pursuant to the provisions of Section 2.201, Title 10, Code of Federal Regulations, consists of this letter and Appendix A (attached).

In Appendix A, the violation is addressed with an explanation of our position regarding validity and date of full compliance. A preliminary root cause determination and associated corrective action is provided. The preliminary nature of this response is necessitated by the complexity of the root cause evaluation associated with the violation. A final response to the violation will be submitted on or before October 28, 1991.

On the cover letter to the Inspection Report, it was noted that the inspection findings indicated weaknesses in the implementation of the System Engineering Program, and that the issue warrants further management attention. The Supply System agrees that improvements can be made in this area. The efforts being implemented to strengthen this program are described below.

The Plant Technical Department at WNP-2 is staffed with a number of engineers who participated in the startup testing program and have remained with the company. This results in a pool of highly qualified senior level professionals available to serve as System Engineers. As a result of this long tenure of service, much of the Plant Technical staff was involved in the development and implementation phases of the various information and tracking systems available. Consequently, requirements have not been established to provide initial or periodic training in these areas. Likewise, system specific training has not been previously formalized, although a number of the staff have received the BWR Fundamentals Course instruction. Consequently, as new individuals enter the organization or new system assignments/duties are made, the engineers must learn through their peers and supervisors. This process is not complete and can leave voids in the total knowledge needed to perform their assignments.

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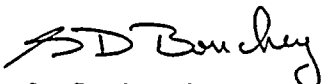
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NRC INSPECTION REPORT 91-24  
RESPONSE TO NOTICE OF VIOLATION

The Plant Technical Department has developed a training matrix which is tailored to the job function. Changes to this matrix will be made to include specific training on the various information systems. Also, intended in this program is the requirement that system engineers participate in the systems portion of the Reactor Operator License Training program for their systems and associated systems. This will include both initial training as well as periodic retraining.

The Plant Technical staff has developed a detailed system walkdown checklist in order to formalize the requirements and expectations of periodic system evaluations. The necessary frequency of the walkdowns is being determined. The checklists will provide a means of documenting the inspections and the results. This process is expected to add structure and consistency to the ongoing system evaluation process.

A projects group is being formed to perform a portion of the project implementation for the Plant. Assistance to this group will be provided as needed by contract personnel, as well as engineers from the Generation Engineering and Plant Technical Departments on a temporary basis. This group will be responsible for controlling the project implementation process and implementation of selected modifications and major projects. This structure will allow flexibility in selection of personnel for specific jobs while providing additional resources to reduce the demand on System Engineers and allow them to dedicate more time to monitoring the health of their system.

Very truly yours,



G. D. Bouchey, Director  
Licensing & Assurance

REF/bk  
Attachments

cc: JB Martin - NRC RV  
NS Reynolds - Winston & Strawn  
PL Eng - NRR  
DL Williams - BPA/399  
NRC Site Inspector - 901A

## Appendix A

During an NRC inspection conducted on July 15 through 19 and August 12 through 16, 1991, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1991), the violation is listed below:

10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures and Drawings", states, in part,

"Activities affecting quality...shall be accomplished in accordance with these instructions, procedures or drawings..."

Licensee Administrative Procedure PPM 1.3.12, Revision 13, "Plant Problems - Problem Evaluation Request" states, in part,

"Any Supply System employee who observes a plant problem or a potential significant problem should immediately notify his/her Supervisor, and initiate a PER."

Paragraph 1.3.12.3.A.1.5 defines a Plant Problem as,

"A potential significant problem requiring disposition, corrective action or a reportability assessment."

Contrary to the above, Maintenance Work Request (MWR) AR 1719, initiated on November 18, 1990 documented a potential significant problem requiring disposition and corrective action, and no Problem Evaluation Report (PER) was initiated. The MWR documented that starting air pressure to one train of the Division 1 diesel air start motors was 250 psig, which is 50 psig above the design rating of the diesel air start motors.

This is a Severity Level IV violation (Supplement 1).

### Validity of Violation

The Supply System acknowledges the validity of this violation. Although the root cause and corrective actions are still under evaluation, the principle root causes for the violation is thought to be the Design Analysis was Less than Adequate because the impact to the air start motors from higher header pressures was not verified. Probable contributing causes are: 1) Change Management was Less Than Adequate because the risks and consequences associated with a procedure change were not adequately reviewed or assessed, and 2) Management Programs were Less Than Adequate because management policy regarding the issuance of PERs versus MWRs is somewhat unclear.

A Design Change was implemented in December of 1986 which removed the relief valves from the air start headers of DG-1 and DG-2. The supporting analysis qualified the header piping to 250 psig (which is the normal operating pressure of the air receivers) in the event the pressure regulator valve failed. An engineering evaluation was also provided which indicated that the air start motors would not be subject to pressures in excess of 200 psig with an air header pressure of 250 psig due to line losses between the air start solenoid valve and the air start motor. However, no tests or calculations were performed to substantiate the evaluation.



Based on the design change and the engineering evaluation, there appears to have been some misunderstanding as to what was the acceptable operating pressure. As a result of this misunderstanding, a Procedure Revision was approved in 1987 which changed the header pressure allowable high limit from 200 psig to 250 psig. Subsequently, several opportunities were missed to initiate a PER documenting high starting air header pressure.

Corrective Steps Taken/Results Achieved

PER 291-0601 was initiated to document failure of DSA-PCV-1A to control the starting air header pressure to the setpoint of 200 psig. The pressure regulator was repaired, and the four (4) air start motors supplied by DSA-PCV-1A (DSA-M-6A1/1, -6A1/2, -6A2/1, & -6A2/2) were removed for inspection for possible damage from overpressurization and replaced with spares. Inspection of the air motors revealed no damage from overpressurization. The allowable high pressure limit in the surveillance procedures was changed from 250 psig to 200 psig. The starting air header pressure for all standby diesel generators have been verified to be within the acceptable limits.

Corrective Action to be Taken

Further corrective actions are anticipated following completion of the Root Cause Analysis.

Date of Full Compliance

Full compliance was achieved when: 1) the high pressure limit in the starting air header in all of the applicable surveillance procedures for the standby diesel generators were reduced as described above; 2) the pressure regulator valve DSA-PCV-1A was repaired, 3) the pressure in the starting air header downstream of DSA-PCV-1A was verified to be within the new limits, and 4) the four affected starting air motors were replaced.

